AUG 1 5 2013

USAO2013R00393

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND



UNITED STATES OF AMERICA

CRIMINAL NO. WOQ-13-043

(Use of Interstate Facilities in Aid of

v.

Racketeering Enterprise (Prostitution),

LAMIN MANNEH,

18 U.S.C. § 1952(a)(3); Aiding and

Abetting, 18 U.S.C. § 2)

Defendant.

INDICTMENT

The Grand Jury for the District of Maryland charges that:

Introduction

At all times relevant to this Indictment,

- Defendant LAMIN MANNEH ("MANNEH") was a resident of Baltimore, 1. Maryland and a uniformed member of the Baltimore Police Department.
- MANNEH was married to M.B., age 19. J.H., also a female, age 19, lived with 2. MANNEH and M.B. MANNEH entered into a "Contract of Slavery" with M.B. whereby M.B. affirmed that she would be subservient to MANNEH as her "master."

MANNEH'S PROSTITUTION BUSINESS

- 3. Between in or about February 2013 to on or about May 9, 2013, MANNEH operated a prostitution business that serviced over 300 customers. The business provided prostitution services to customers who came to an agreed location MANNEH maintained for that purpose ("in-call"), as well as at locations specified by the customers ("out-call"). M.B. and J.H. worked as prostitutes for MANNEH. As part of his prostitution business, MANNEH:
 - drafted, paid for and posted more than 50 prostitution advertisements for J.H. a.

and M.B. on various Internet websites.

- b. rented an apartment where **MANNEH** facilitated "in-call" commercial sex acts with clients who responded to advertisements for J.H. and M. B.;
- c. rented various hotel rooms where **MANNEH** facilitated "in-call" commercial sex acts with clients who responded to advertisements for J.H. and M.B.;
- d. drove J.H. and M.B. to various "out-call" commercial sex acts at residences and hotel rooms;
- e. provided J.H. and M.B. with Samsung cell phones and introduced them to "voice-over-Internet" phone services that were used to communicate with prospective clients and one another;
 - f. provided J.H. and M.B. with condoms;
- g. waited outside commercial sex act locations and electronically messaged with J.H. and M.B. while they were with clients;
- h. carried his police-issued firearm with him and agreed to forcibly interrupt a commercial sex interaction if the client were aggressive or non-compliant;
- i. collected the entirety of M.B.'s prostitution earnings and a percentage of J.H.'s earnings; and
- j. frequently purchased synthetic marijuana ("K2" or "Spice") for J.H. and M.B. and encouraged them to smoke.

The Charge

3. Beginning as early as February 2013, and continuing through May 9, 2013, in the District of Maryland and elsewhere, the defendant,

LAMIN MANNEH,

traveled in interstate commerce and used a facility in interstate and foreign commerce, with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on, of an unlawful activity, to wit, a business enterprise involving prostitution offenses in violation of the laws of the State of Maryland, and thereafter performed and attempted to perform an act that promoted, managed, established, carried on and facilitated the promotion, management, establishment and carrying on of said unlawful activity.

Acts that Facilitated the Prostitution Business

- 4. Acts performed or attempted to be performed that promoted, managed, established, carried on and facilitated the promotion, management, establishment and carrying on of MANNEH's prostitution business included at least one of the following acts, among others, in the District of Maryland and elsewhere:
- a. MANNEH posted multiple advertisements on backpage.com under the "escorts" section using his own credit card, personal computer and email address, rsamuarai@yahoo.com.
- b. MANNEH rented a hotel room at Motel 6 in Baltimore, Maryland on May
 7, 2013 for purposes of hosting commercial sex;
- c. **MANNEH** drove M.B. to an "out-call" on May 9, 2013 at the BWI Hotel District in Linthicum, Maryland, and waited outside in his personal vehicle.

- MANNEH electronically messaged M.B. while she met with a prospective d. client on May 9, 2013.
- MANNEH gave M.B. and J.H. Samsung Galaxy SIII phones and taught them e. to use Google Voice to communicate regarding their prostitution activities.

18 U.S.C. § 1952(a)(3) 18 U.S.C. § 2

Cosenden orner by MWC United States Attorney

A TRUE BILL:

8/15/13